

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION**

**B.P., et al.,**

**Plaintiffs,**

**v.**

**No: 2:23-cv-00071-TRM-JEM**

**CITY OF JOHNSON CITY, TENNESSEE, et al.,**

**Defendants.**

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**DECLARATION OF VANESSA BAEHR-JONES**

I, VANESSA BAEHR-JONES, declare under penalty of perjury that the foregoing is true and correct:

1. I am over twenty-one years of age and am competent in all respects to give this Declaration. This Declaration is given freely and voluntarily. I have personal knowledge of the foregoing matter and could, and would, testify competently thereto under penalty of perjury.
2. I am lead counsel for Plaintiffs B.P., et al., in the above-referenced case. I am a licensed attorney in good standing in the State of California (CABN 281715) and admitted to appear *pro hac vice* in this District.
3. Attached hereto as Exhibit 1, and filed under seal, is a true and correct copy of bank records received from Renasant Bank in response to a third-party subpoena in this case.
4. Attached hereto as Exhibit 2 is a true and correct copy of a document produced by Defendant Johnson City in discovery in this case.

5. Attached hereto as Exhibit 3 is a true and correct copy of a document produced by Defendant Johnson City in discovery in this case. According to an email I received from counsel for Defendant City, JCPD officers accessed this public record concerning the tax sale of Sean Williams' property during 2022.
6. On March 15, 2024, Plaintiffs provided notice to Defendants in this case that they planned to serve a third-party subpoena on Female 4, and, on March 21, 2024, Plaintiffs served the subpoena. A true and correct copy of the email and attached subpoena is attached hereto as Exhibit 4.
7. Prior to filing her motion to quash, Female 4 did not contact Plaintiffs' counsel or object to the subpoena. Had Female 4 or her counsel contacted Plaintiffs, counsel would have granted her an extension.
8. The "TBD" listed under location was intended to be a placeholder until Female 4 had been served and Plaintiffs' counsel could hopefully determine a location convenient for both Plaintiffs' counsel and Female 4, or provide for the possibility of an electronic exchange of documents, in which case a physical location would not be necessary.
9. Female 4's delay in responding to the subpoena has prejudiced Plaintiffs by depriving them of critical discovery needed for motion practice and depositions and generally impeding their investigation. Depositions in this case begin on May 21, 2024 (less than a week from this filing), and Plaintiffs urgently need the documents requested in the subpoena to Female 4.

This is the 14th day of May 2024.

*/s/ Vanessa Baehr-Jones*  
VANESSA BAEHR-JONES